

THE LUBRIZOL CORPORATION P.O. BOX 158 41 TIDAL ROAD DEER PARK, TX 77536-0158 TELEPHONE: 713/479-2851

September 15, 1998

NWM-044-98

Texas Natural Resource Conservation Commission Office of Water Management Self-reporting Section P.O. Box 13087 Austin, Texas 78711-3087

RE: TNRCC Water Discharge Permit No. WQ000639

Attention: Representative

Please be informed that recent water discharges from the Lubrizol Corporation- Deer Park Plant exceeded the limits of the above-referenced permit as follows:

DATE	OUTFALL	PARAMETER	RESULT	LIMIT
9/10/98	(001	Flow, Daily Max.	1.570 Million Gal/Day	1.440 Million Gal/Day
9/11/98	001	Flow, Daily Max.	2.300 Million Gal/Day	1.440 Million Gal/Day
9/12/98	001	Flow, Daily Max.	1.790 Million Gal/Day	1.440 Million Gal/Day

Due to flooding conditions at the facility, the above flow exceedences were experienced. This was caused by 15.3 inches of rain during this period from Tropical Storm Francis. In-addition, the treatment system was bypassed through Outfall 001 to prevent the loss of the entire treatment system for 3.25 hours on 9/11/98. The TNRCC, HCPCD, USCG and EPA were notified at the time the bypass occurred. There was no detrimental effects to Patrick Bayou, no visible organic release, pH of 8.8, TOC of 141 mg/L, O&G of 5.0 mg/L and Zinc was 0.161 mg/L. The system was bypassed for only that amount of time to prevent total loss of the treatment system and was promptly placed back in normal service once flow had abated.

Lubrizol regrets any inconvenience these permit exceedences may have caused and the company remains committed to making every reasonable effort to assure compliance with the TNRCC water discharge permit requirements. Should you have any further questions, please contact me at (281) 479-2851.

Sincerely,

THE LUBRIZOL CORPORATION

John H. Garrett

Works Manager, Deer Park Plant

JHG/nwm

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